

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

MARCO THOMAS,

Plaintiff,

v.

Case No. 3:18CV00030

JASON NORTON,

Defendant.

**DEFENDANT JASON NORTON'S**  
**RULE 12(B)(6) MOTION TO DISMISS THE COMPLAINT**

NOW COMES Defendant Jason Norton (“Norton”), by counsel, pursuant to Federal Rule of Civil Procedure 12(b)(6), and moves this Court to dismiss, with prejudice, the Complaint (ECF Doc. 1) filed against him in its entirety as it fails to state any claim upon which relief can be granted under either 42 U.S.C. § 1983 or the common law of Virginia, and fails to allege facts sufficient to establish a legally cognizable cause of action. Norton relies upon and incorporates his Brief in Support of the Motion to Dismiss the Complaint as if fully set forth herein.

**JASON NORTON**

By Counsel

/s/

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**C E R T I F I C A T E**

I hereby certify that on the 16<sup>th</sup> day of February, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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